

Message

From: Walker, Stuart [Walker.Stuart@epa.gov]
Sent: 5/1/2019 10:23:09 PM
To: Sanchez, Yolanda [Sanchez.Yolanda@epa.gov]
CC: LEE, LILY [LEE.LILY@EPA.GOV]
Subject: RE: HPNS | Navy website update on its March letter and ongoing discussions with EPA

So it appears the Navy is not going to use the consultation process.

Their argument seems to be that Argonne National Lab, which developed RESRAD, likes it more than the PRG calculator, which was developed by Oak Ridge National Lab. This is like saying if Honda says their cars are better than Toyota's, then you have to buy a Honda. It's also seems inconsistent with EPA Superfund guidance, which would mean being out of compliance with CERCLA section 120(a)(2). Note in the original RESRAD vs PRG calculator comparison by the Argonne manager of RESRAD, Charley Yu, he admitted RESRAD was inconsistent with EPA's approach for addressing chemical contamination. It is EPA's policy that the modelling for risk assessment for radionuclides and chemicals at a CERCLA site should be consistent.

Also note that the Navy's argument also implies that the PRG calculator is only for screening, which indicates they don't understand the Superfund risk assessment process. I will forward an email I sent to the regions which explains our policy on this matter. I think they may think that EPA's CERCLA approach mirrors NRC's AEA approach.

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From: Sanchez, Yolanda
Sent: Wednesday, May 01, 2019 4:33 PM
To: Walker, Stuart <Walker.Stuart@epa.gov>
Cc: LEE, LILY <LEE.LILY@EPA.GOV>
Subject: FW: HPNS | Navy website update on its March letter and ongoing discussions with EPA

FYI, Stuart, see Navy's argument on RESRAD below.

From: Sanchez, Yolanda
Sent: Wednesday, May 1, 2019 1:30 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Yogi, David <Yogi.David@epa.gov>
Cc: Hage, Christopher <hage.christopher@epa.gov>; Clancy, Maeve <Clancy.Maeve@epa.gov>; Fairbanks, Brianna <fairbanks.brianna@epa.gov>
Subject: HPNS | Navy website update on its March letter and ongoing discussions with EPA

The Navy updated their "Timely Topics" webpage to include a blurb about their March 15 letter and finalizing the FYR and Parcel G Work Plan. See except below. FYI only.

April 29, 2019

Update regarding the finalization of Navy's Hunters Point Five Year Review and Parcel G work plan

Statement: The Navy is working with the Environmental Protection Agency to finalize its Five Year Review and Parcel G work plan for Hunters Point.

The focus of the collaboration with the EPA is to ensure the Parcel G work plan provides credible data about site conditions and to verify remediation efforts have met clean-up goals. The effort also includes analyzing program impacts from the Tetra Tech data falsification. Once work plan details are finalized the re-evaluation of this site will move forward.

The Navy has proposed the use of RESRAD as part of the Hunters Point cleanup. RESRAD is a regulatory tool developed by Argonne National Lab and is the Navy and environmental clean-up industry's most trusted tool for determining radiological risk. It has been used for decades by the Navy BRAC program, U.S. Department of Defense, and the U.S. Department of Energy for radiological clean-up programs nationwide. The Navy believes it is the right tool to ensure the cleanup is completed properly at Hunters Point.

The Navy also sent a letter on 15 March to regulatory agencies about its intent to use RESRAD over the PRG calculator.

DOE and Argonne National Laboratory studies highlight the benefits RESRAD over other tools such as the Preliminary Remedial Goal (PRG) Calculator that was developed for use as a screening tool; however, the Navy will continue to work with the EPA on using the PRG Calculator at Hunters Point to complement the RESRAD tool.

Once the EPA approves the Navy's updates to the Hunters Point work plan, the Navy is ready to begin radiological retesting of Hunters Point.